

Jeffrey Tsai (SBN 226081)
jeff.tsai@us.dlapiper.com
DLA PIPER LLP (US)
555 Mission Street, Suite 2400
San Francisco, CA 94105-2933
Tel: (415) 615-6055

Darryl Louis Tarver (*Admitted pro hac vice*)
darryl.tarver@us.dlapiper.com
DLA PIPER LLP (US)
650 S. Exeter Street, Suite 1100
Baltimore, MD 21202
Tel: (410) 580-4123

Attorneys for Defendant Sheng Thao

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,
v.
SHENG THAO,
ANDRE JONES,
DAVID TRUNG DUONG, and
ANDY HUNG DUONG,
Defendants.

Case No. 4:25-CR-3-YGR

**DEFENDANT SHENG THAO'S JOINDER
IN DEFENDANT ANDY DUONG'S
MOTION TO SUPPRESS (ECF NO. 138)**

1 Defendant Sheng Thao, through her counsel, hereby respectfully joins as to certain
 2 arguments set forth in Defendant Andy Duong's motion to suppress (ECF No. 138) addressing
 3 the February 2024 and May 2024 warrants through which the government obtained information
 4 from various Apple, Microsoft and Google accounts, including Apple and Google accounts used
 5 by Ms. Thao.

6 Specifically, Andy Duong argues that the February 2024 and May 2024 warrants are
 7 overbroad insofar as they authorize the government's search and seizure of electronic evidence
 8 dating back to January 1, 2020, even though the affidavits set forth probable-cause allegations
 9 going back no earlier than December 2021. See ECF No. 138 at 23. This argument applies with
 10 equal, if not greater, force to Ms. Thao because the government's probable-cause allegations
 11 concerning Ms. Thao date no earlier than October 2022. See, e.g., ECF No. 136-1, Ex. 2 ¶¶ 32-
 12 84 (under seal).

13 Thus, for the same reasons articulated in support of Andy Duong's motion, Ms. Thao
 14 respectfully submits that evidence seized pursuant to the February 2024 and May 2024 search
 15 warrants should be suppressed.

16 Dated: December 12, 2025

17 Respectfully submitted,

18 DLA PIPER LLP (US)

19 By: /s/ Jeffrey Tsai

20 JEFFREY TSAI

21 DARRYL LOUIS TARVER (*Admitted pro hac vice*)

22 Attorneys for Defendant Sheng Thao

23

24

25

26

27

28